

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIM. NO. 05-10188-MLW
)
RICHARD SHIPLEY,)
)
Defendant.)

GOVERNMENT'S SUBMISSION RE:VOIR DIRE

In addition to the usual questions posed by the Court during the voir dire process, the government respectfully requests the following specific inquiries be made:

1. Have you had any negative experiences with law enforcement? If so, explain at side bar. Would it affect your ability to be fair in this case?

2. Are you less likely to believe someone because he or she is a member of law enforcement?

3. Have you had any bad experiences with the U.S. Postal Service or the Department of Labor? If so, explain at side bar. Would it affect your ability to be fair in this case?

4. Have you or an immediate family member ever made a worker's compensation claim due to an injury at work? If so, explain at side bar. Would it affect your ability to be fair in this case?

5. Have you or any members of your family or close friends been involved in the criminal justice system as a defendant in a

criminal case? If so, would your experience as a criminal defendant, or as the family member or friend of a criminal defendant, render you unable to be a fair and impartial juror in this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Dated: January 31, 2006

By: /s/ Brian T. Kelly
BRIAN T. KELLY
SABITA SINGH
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Brian T. Kelly, Assistant United States Attorney, do hereby certify that this document, filed through the ECF (Electronic Case Filing) system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

Dated: January 31, 2006

By: /s/ Brian T. Kelly
BRIAN T. KELLY
SABITA SINGH
Assistant U.S. Attorneys